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04-23-07

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Into)
Implementation of Federal Communications) R. 04-12-001
Commission Report and Order 04-87, As It)
Affects The Universal Lifeline Telephone Service)
Program.)

OPENING COMMENTS OF SUREWEST TELEPHONE (U 1015 C)
AND SUREWEST TELEVIDEO (U 6324 C)

ON

PROPOSED DECISION OF ALJ JONES ADOPTING STRATEGIES TO IMPROVE THE
CALIFORNIA LIFELINE CERTIFICATION AND VERIFICATION PROCESSES, AND
REINSTATING PORTIONS OF GENERAL ORDER 153

E. Garth Black
Mark P. Schreiber
Sean P. Beatty
Patrick M. Rosvall
COOPER, WHITE & COOPER LLP
201 California Street – 17th Floor
San Francisco, CA 94111
Telephone: (415) 433-1900
Telecopier: (415) 433-5530

Attorneys for
SureWest Telephone and SureWest TeleVideo

April 23, 2007

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1 **I. INTRODUCTION.**

2 Pursuant to Rule 14.3 of the California Public Utilities Commission's ("Commission")
3 Rules of Practice and Procedure, SureWest Telephone (U 1015 C) and SureWest TeleVideo (U
4 6324 C) ("SureWest") hereby submit their opening comments on the Proposed Decision Of ALJ
5 Jones Adopting Strategies To Improve The California LifeLine Certification And Verification
6 Processes, And Reinstating Portions Of General Order 153 ("Proposed Decision"). SureWest
7 appreciates the Commission's efforts to improve the operation of the LifeLine certification and
8 verification process, and to rectify the problems that have arisen since the third-party certifying
9 agent (currently "Solix") assumed responsibility for confirming customer eligibility.

10 With some revisions, the Proposed Decision will embody a strong set of short-term
11 solutions, many of which would help ameliorate the difficulties that customers and carriers have
12 faced under the new system. *First*, the Commission should not adopt a requirement that carriers
13 provide "reminder notices" to customers who have signed up for LifeLine service. This carrier
14 involvement in the certification process is unnecessary and inconsistent with the Commission's
15 prior determinations that it would rely on a third party to perform certification-related functions.
16 If "reminder notices" are required, they should only be mandated for a six-month period as a
17 temporary measure while the Commission pursues long-term program changes. *Second*, the
18 Commission should require that Solix give carriers at least three business days' advance notice of
19 any system or program changes, and that any changes be implemented during non-business hours
20 Pacific Time. *Third*, the Proposed Decision should clearly state that any recommendations from
21 the Lifeline implementation and marketing "working groups" must be formalized in a Commission
22 Resolution or Decision before they become policy. *Fourth*, the Proposed Decision should provide
23 additional guidance to carriers and customers regarding the types of questions about the program
24 that should be answered by carriers, the certifying agent, and the Commission. With these
25 changes, SureWest would support the Proposed Decision.

26 While the Commission pursues these short-term, incremental "fixes" to the program, it
27 should not lose sight of the need for long-term reform. Most importantly, it is absolutely critical
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1 to the success of the program that the Commission require the certifying agent to send certification
2 and verification materials to customers using first-class mail. Based on SureWest's experiences
3 under the new LifeLine certification program, the most significant cause of the low response rate
4 and customer complaints is the fact that customers are not receiving certification documents in a
5 timely manner. Moreover, to create the proper incentives for customers to complete the
6 certification process, and to avoid the need to back-bill denied customers for multiple months of
7 service, the Commission should provide that LifeLine discounts will only be given after a
8 customer's eligibility has been confirmed. The Commission should also make it easier for
9 customers to obtain certification documents by making those documents available on the internet,
10 through community-based organizations, and through other public sources. Further, the
11 Commission should actively pursue the adoption of a web-based certification alternative. While
12 some of these more holistic program changes will take time to effectuate, SureWest believes that
13 these are the most direct and complete ways to repair the ULTS certification and verification
14 processes.

15 **II. WITH SOME REVISIONS, SUREWEST SUPPORTS THE COMMISSION'S**
16 **SHORT-TERM APPROACH TO IMPROVING THE ULTS PROGRAM.**

17 In general, the Proposed Decision presents a well-considered approach to addressing some
18 difficult problems within a short timeframe. This is particularly admirable given the constraints of
19 the state contracting process and the difficulty of adopting more long-term fixes. Nevertheless,
20 there are aspects of the Proposed Decision that should be modified to avoid hardship to customers
21 and difficulties for carriers. The Proposed Decision also requires clarification in several respects.
22 SureWest proposes that the Proposed Decision be revised as set forth below.

23
24 **A. The Proposed Decision Should Not Adopt a Permanent Requirement that**
25 **Carriers Provide "Reminder Notices" to LifeLine Customers.**

26 The Proposed Decision would impose an ongoing requirement on carriers that "reminder
27 notices" be provided to all new enrollees in the LifeLine program. *Proposed Decision*, at p. 16.
28

1 This additional regulatory requirement is unnecessary in light of the sources of the certification
2 problems, and inconsistent with the Commission's established policy of relying on a third-party
3 certifying agent as the focal point of the certification process. As discussed in further detail
4 below, the low response rates and customer complaints have been caused largely by the untimely
5 mailing of certification documents, and by the issuance of LifeLine discounts prior to completion
6 of the certification process. Compared to these issues, SureWest does not believe that customer
7 confusion about Solix's role in the certification process has been a significant contributing factor
8 to the problems with the LifeLine program. The Commission should devote its resources to
9 addressing the major problems with the program rather than imposing a new regulatory
10 requirement on carriers that will not squarely address those problems, and the costs of which will
11 ultimately be borne by the ULTS fund. These costs would be better spent on first-class mailings
12 of certification forms, as discussed below. The Staff Report does not include sufficient evidence
13 of a problem that would justify this requirement.
14

15 Having made the choice to rely on a third-party certifying agent as the central point of
16 contact for the certification process, the Commission should not now deviate from that decision by
17 roping carriers back into the process. The Staff Report finds that prospective LifeLine customers
18 should be given additional "touches" in order to inform them about the process, but there is no
19 reason why those additional "touches" could not come from the certifying agent. As part of the
20 LifeLine enrollment process, carriers already provide all of the necessary information about the
21 certification process, including information about the mailing of the certification forms, and the
22 fact that those forms must be returned to the third-party administrator. *See* G.O. 153 § 4.2.1.2.2.
23 The "script" in General Order 153 should be sufficient to convey the message to customers that a
24 third-party entity is facilitating the certification process. The proposed new Section 4.1.3 of
25 General Order 153 and the associated "reminder notice" contain information that is entirely
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1 duplicative of what is already in Section 4.2.1.2.2. The proposed Section 4.1.3 should not be
2 adopted.

3 If, notwithstanding the arguments above, the Commission elects to adopt a "reminder
4 notice" requirement for LifeLine customers, that requirement should not be adopted on a
5 permanent basis. Rather than modifying General Order 153, the Commission could adopt this
6 requirement as an interim measure for a period of six months. This would allow the Commission
7 sufficient time to resolve some of the long-term issues with the LifeLine program, including the
8 untimely mailing issue. If Solix mails the certification forms via first-class mail, they will arrive
9 within approximately three days, and there would be no need for carriers to provide a notice
10 reminding the customer that the forms are coming. Even if there were a justification for this
11 requirement, that justification would certainly disappear when the mailing issue is corrected.
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13 **B. The Commission Should Establish Stricter Procedures Governing Solix-**
14 **Initiated Changes to the Verification Process, the Certification Process, the**
15 **File Transfer Protocol System, or the Web-Based System.**

16 The Commission should implement a formalized procedure for the certifying agent to
17 notify carriers of any changes to the certifying agent's systems or its data processing protocols. If
18 carriers are not informed of these modifications in the system, confusion, disruption, and/or
19 erroneous processing of data may occur. Since the problems with the certification and verification
20 processes were brought to light, Solix has been called upon to make necessary changes to its
21 systems. In some instances, carriers have not been properly informed of the changes, resulting in
22 significant confusion. For example, on or around March 20, 2007, Solix modified its protocol for
23 generating the "effective date" field in its return data feeds to carriers. Prior to that date, SureWest
24 understands that Solix had been using the LifeLine "start date" as the "effective date." Without
25 informing carriers of the change, Solix unilaterally modified the "effective date" field to reflect the
26 "date on which Solix processed the customer's information." Solix had a valid reason for making
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1 this change, but it did not inform carriers in a timely manner that the change had been made.
2 Since some carriers had been generating their LifeLine claim information from the "effective date"
3 field in Solix's return feeds, the change in the meaning of that field had a significant impact on the
4 accuracy of those carriers' claims. Had carriers been informed in advance of the impending
5 system modification, there would have been time for carriers to alter their systems to draw claim
6 information from a source other than Solix's "effective date" field.

7
8 To prevent this type of situation from arising in the future, the Proposed Decision should
9 include a directive that the certifying agent must maintain a list of carrier contacts, and provide at
10 least three business days' advance notice via email of any changes to the Solix system or
11 processing protocols. The collection of contact information can be facilitated through the
12 implementation "working group" at the direction of Commission staff. SureWest also supports the
13 requirement in the Proposed Decision that Solix must report any system "glitches" to the
14 Commission within 48 hours of when they are discovered. *Proposed Decision*, at pp. 18-19.
15 Carrier contacts should also be informed of any problems through a similar mechanism. The
16 certifying agent should be required to include carriers on any correspondence to the Commission
17 that identifies "glitches." Solix should also be instructed to follow through with individual carrier
18 "fixes" in a prompt manner.

19
20 There are other steps that should be taken to prevent problems from arising in connection
21 with systems changes initiated by the certifying agent. Any changes to the system should occur at
22 non-business hours in the Pacific Time Zone. Probably because Solix is based in New Jersey,
23 there have been instances where system changes have been made in the middle of the day on the
24 West Coast. The certifying agent should manage its system modifications so that the database
25 does not change while carriers are actively utilizing it during normal business hours.
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1 **C. Recommendations from the "Working Groups" Should be Formalized in**
2 **Commission Resolutions in Phase II of this Proceeding Before they**
3 **Become Commission Policy.**

4 To ensure that all interested parties have notice and an opportunity to be heard regarding
5 any proposed changes to the LifeLine program, the recommendations of the working groups
6 should not become Commission policy until they are adopted in a Commission Resolution.
7 SureWest appreciates the Commission's creation of the working groups. The groups have been an
8 effective way to open the channels of communication between Solix, the Commission, and carriers
9 regarding LifeLine issues. SureWest also appreciates the need to allow the working groups to
10 function without micro-management from the Commission. However, the working groups have
11 been the genesis of a number of significant changes to the LifeLine certification and verification
12 processes. While many carriers and other interested parties participate on the working group calls,
13 the participation is far from universal. In light of this fact, and in keeping with proper
14 administrative processes, the working groups should be considered advisory bodies, not decision-
15 making bodies.

16 The working groups should make recommendations that can be presented and evaluated
17 through the Commission's typical administrative policymaking procedures. SureWest supports the
18 Commission's directive that staff be allowed to "make further amendments to the G.O. via the
19 resolution process as long-term solutions to the mailing and other issues are identified and changes
20 to the G.O. warranted." *Proposed Decision*, at p. 9. Either a Resolution or a full Commission
21 Decision should be necessary to implement any new policy recommendations from the working
22 groups. The Proposed Decision should be clarified to reflect this concept.

23 **D. The Commission Should Clarify the Allocation of Informational**
24 **Responsibilities Between CAB, the Certifying Agent, and Carriers.**

25 At times, there appears to have been a lack of clarity regarding the types of customer
26 questions that carriers should answer as opposed to inquiries that should be resolved by the
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1 Commission's Consumer Affairs Branch ("CAB") or by the certifying agent. When the new
2 certification and verification process was adopted, SureWest had understood that the certifying
3 agent would largely be responsible for responding to customer inquiries about the program, and
4 about customer eligibility. SureWest believes that carriers should provide general information
5 about the program, information about the eligibility requirements in general, and information
6 about the billing impacts of being a LifeLine customer. All other inquiries about the program
7 should be handled by the certifying agent. Issues regarding appeals should be handled by CAB.
8

9 SureWest understands from customers that there have been some instances where
10 customers are bounced back and forth between carriers and Solix and the Commission without
11 receiving answers to their questions. Unless the information the customer is requesting is
12 uniquely within the purview of the carrier, such as in the case of specific billing-related issues,
13 Solix should be responsible for handling customer inquiries. Moreover, the Commission should
14 further clarify the procedure for handling back-credits generated by successful appeals. SureWest
15 had understood that CAB would direct Solix to send records to carriers where appeals have been
16 successful, but this does not appear to be occurring in all cases. The Proposed Decision should
17 clarify and formalize the allocation of informational responsibility amongst CAB, Solix, and the
18 carriers.
19

20 **III. THE COMMISSION SHOULD FOCUS ITS ATTENTION ON SOME**
21 **IMPORTANT LONG-TERM CHANGES TO THE LIFELINE PROGRAM.**

22 While the reforms in the Proposed Decision should help to increase customer response
23 rates and reduce the number of customer complaints, further changes are necessary. SureWest has
24 been an active participant in the implementation and marketing "working groups" that were
25 created in November 2006 to address the problems with the LifeLine program. Based on this
26 participation, and based on SureWest's own experiences with LifeLine customers, SureWest has
27 identified four key long-term program changes that will dramatically improve the program. These
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1 areas should be the focus of the Commission's working group efforts in the months to come. Any
2 short-term modifications adopted at this juncture must be viewed in the broader context of the
3 Commission's long-term approach.

4 **A. The Commission Must Ensure that the Certifying Agent Mails the**
5 **Certification and Verification Documents to Customers in a Timely Manner**
6 **via First-Class Mail.**

7 By far, the most significant source of customer frustration under the LifeLine program has
8 been that customers have not received their certification materials in a timely manner. SureWest
9 began hearing about this problem from customers shortly after the program began, and the
10 problem remains unresolved today. Before Solix took over the responsibility for sending the
11 documents to customers, carriers were uniformly sending certification materials via first-class
12 mail. First-class mail delivery is guaranteed, and it is typically delivered within two or three days
13 anywhere in the United States. As evidenced in part by the 70% customer response rates that
14 carriers achieved under the old certification system, first-class mail was a timely and reliable
15 means of transmitting certification forms to customers.

16
17 When Solix began providing the certification materials to customers in July 2006, Solix
18 used standard bulk mail. Standard mail delivery is not guaranteed, and can take considerably
19 longer to get to recipients than first-class mail. Recent tests have confirmed that Solix-provided
20 certification forms are taking approximately eight to 14 days to arrive. *See Staff Report*, at p. 18.¹
21 In some cases, customers have reported not receiving the forms even after the certification due
22 dates have passed. This is an unacceptable practice that SureWest believes is responsible for the
23 bulk of the problems with the LifeLine program since its inception.
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27 ¹ The "Staff Report" refers to the Report on Strategies to Improve the California Lifeline
28 Certification and Verification Processes. This Staff Report appears as an attachment to the
Proposed Decision.

1 Unfortunately, neither the Commission nor carriers became aware of this issue until the
2 middle of January when the mailing issue was raised during an implementation working group
3 conference call. Carriers were asking Solix about customer reports of significant delays in
4 receiving certification documents during the 2006 holiday season. For the first time, Solix
5 admitted that it had been using standard mail rather than first-class mail. The existing contract
6 with Solix does not specify a mailing protocol. Since the Commission's first contract amendment
7 with Solix had already been submitted to the Department of General Services by the end of
8 December, it was too late to incorporate a change in the mailing protocols into the amendment.
9 As a result, the use of standard mail persists today.
10

11 Although the proposed expansion of the time period for returning forms will help mitigate
12 the impact of standard mail delays, it will not solve the problem. Customers will still be puzzled
13 at not receiving certification documents in a timely manner. In many cases, getting certification
14 documents to customers swiftly could make the difference between a customer following up to
15 obtain a LifeLine discount, and letting the matter slip due to the press of other concerns.
16 Moreover, the expansion of the certification period may cause other customer hardships, since a
17 customer may be back-billed for an additional month of LifeLine discounts if he or she is deemed
18 ineligible.
19

20 The Commission should seek a further amendment to the Solix contract at the earliest
21 possible opportunity to require that correspondence from Solix to customers be transmitted using
22 first-class mail. Many of the proposals in the Proposed Decision are designed to mitigate the
23 impact of customers' having not received certification documents in time to qualify for LifeLine
24 discounts, but the Proposed Decision does not address the main source of the problem. Only by
25 addressing the mailing issue will the Commission be able to provide all qualified customers with a
26 full and fair opportunity to receive a discount.
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1 **B. The Commission Should Reverse the Current Policy of Requiring LifeLine**
2 **Discounts to be Provided Before the Certification Process is Complete.**

3 Aside from correcting the mailing problem, the single most important reform that the
4 Commission could adopt would be to discontinue the policy of providing LifeLine discounts to
5 customers before their eligibility has been confirmed. In D.05-12-013, the Commission
6 determined that customers should be given LifeLine discounts "at the point of the first consumer
7 contact." D.05-12-013, *mimeo*, at p. 8. SureWest consistently opposed that outcome during the
8 initial stages of this proceeding, largely based on a belief that a pre-qualification requirement was
9 mandated by the FCC's *Lifeline / Linkup Order*,² but also based on concerns that back-billing and
10 bad debt issues would be exacerbated by giving discounts prior to confirmation of eligibility.

11 In light of the problems that have emerged during the first nine months of the program, the
12 time has come to revise the Commission's approach to the timing of LifeLine discounts. The
13 problems with the current policy are two-fold. First, since customers are given discounts before
14 they complete the certification documents, the incentive to follow through with filling out and
15 returning the form is significantly reduced. Despite the efforts of carriers and Solix to emphasize
16 that the discounts are contingent upon complying with the certification procedures, granting an
17 immediate discount conveys the impression that no further action is necessary. Consumers would
18 be far more likely to promptly and diligently comply with the certification procedures if they had
19 not yet received a discount.

20 The second and perhaps more significant problem with giving immediate LifeLine
21 discounts under the current process is that the back-billing impacts on customers can be extreme.
22 Under the current system, if a customer fails to return the certification form in a timely manner or
23 fails to meet the program criteria, the customer will be back-billed for the discounted portion of
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27 ² *Lifeline and Link-Up Report and Order and Further Notice of Proposed Rulemaking*, WC
28 Docket No. 03-109, FCC 04-87 (rel. April 29, 2004).

1 two months of service, plus the discounted portion of any applicable connection or conversion fee.
2 This amount can be between \$50 and \$150, a considerable sum for a low-income household that is
3 truly qualified for LifeLine. If a customer reapplies and is again denied, the customer could be
4 forced to pay another \$50 to \$150 in back-billed amounts. The back-billing impacts are
5 particularly troubling in light of the untimeliness of the certification documents and the fact that
6 many Lifeline-eligible customers are applying for discounts several times before successfully
7 completing the process. As some consumer advocates observed during the March 8, 2007 "all
8 party meeting" with Commissioner Grueneich, some customers cannot pay the unexpected back-
9 billed amounts, so they are forced to drop their phone lines. Some of these customers will never
10 come back on the system since they cannot pay their outstanding debt. This is an unfortunate
11 outcome for low-income consumers, and it undermines the universal service goals of the LifeLine
12 program.
13

14 To avoid this back-billing problem, and to enhance the incentives for customers to return
15 certification documentation in a timely manner, the Commission should move to a pre-
16 qualification regime. SureWest appreciates the Commission's inclusion of this proposal in the
17 Staff Report, and SureWest urges the Commission to actively pursue this proposal as a long-term
18 improvement to the LifeLine program. *See Staff Report*, at pp. 32-33. Under this proposal, new
19 customers would be charged full tariffed rates upon service initiation, and then the carrier should
20 issue back-credits to the customer if the customer is ultimately deemed eligible for LifeLine
21 discounts. This pre-qualification procedure would remove any back-billing possibilities from the
22 process, and would encourage the consumer to identify, fill out, and submit certification
23 documentation in a timely manner. Customers would also have the option to wait until the
24 certification process is complete to begin receiving telephone service. If an expeditious web-based
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1 system can be developed to confirm customers' eligibility within a few days (or even hours), this
2 would further enhance the attractiveness of a pre-qualification procedure.

3 **C. The Commission Should Pursue a Long-Term Marketing Strategy that Would**
4 **Permit Customers to Obtain Certification Documents from a Variety of**
5 **Sources.**

6 To supplement the mailing solution and the pre-qualification proposal outlined above, the
7 Commission should also investigate ways to broaden the channels through which customers can
8 obtain certification documentation. The easier it is for customers to get certification forms in their
9 hands, the more likely it will be that they can complete the certification process.

10 Under the current system, a customer can only receive a valid certification form through a
11 single channel, and through compliance with a narrow set of procedures. The customer must call
12 the carrier to request that he or she be placed on LifeLine service. This generates a data feed from
13 the carrier to Solix, which generates a request from Solix to Solix's "fulfillment center." The
14 fulfillment center then sends a certification form to the customer. Unless the consumer fills out
15 and returns the exact, bar-coded form that was provided by Solix, Solix will not process the
16 customer's application. If the customer misplaces the certification form, the only solution is to
17 request another bar-coded form from Solix. Given the current timeframes for mailing these
18 documents, it is unlikely that a replacement form would be received in time for the customer to
19 return before the due date. Even with the expanded certification period outlined in the Proposed
20 Decision, the ability of a customer to obtain and return a replacement form would be dubious.

21 Although it may take some time for Solix to adjust its procedures, and it may require some
22 further modifications to Solix's contract, SureWest believes that the channels through which
23 certification documents are available should be expanded. Certification documents should be
24 made available on a website so that customers can fill out the forms immediately, and they can
25 download replacement forms as necessary. It also may be productive to allow community-based
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1 organizations to pass out certification forms to their constituencies. SureWest is not certain why
2 the certifying agent can only process the bar-coded forms that are specific to each customer, but
3 SureWest is confident that the implementation issues raised by this proposal could be addressed
4 through the working groups.

5 **D. The Commission Should Encourage the Timely Development of a Web-Based**
6 **Enrollment System.**

7 The development of a web-based solution for enrolling customers will also help the
8 Commission to maximize participation in the LifeLine program. In D.05-12-013, the Commission
9 ordered that the certifying agent and the Commission should begin work on a web-based
10 enrollment system within one year of the time when the certifying agent's contract is implemented.
11 D.05-12-013, *mimeo*, at p. 59 (Findings of Fact 4-6). The web-based system must be implemented
12 by one year after work on the project begins. Since Solix's contract was implemented on July 1,
13 2006, work on the web-based system must begin on July 1, 2007, and it must be completed by
14 July 1, 2008. *Staff Report*, at p. 15.

15 SureWest supports the development of a web-based system as a way to streamline and
16 expedite the certification process. As the Staff Report notes, other states have developed web-
17 based mechanisms for enrolling customers in the program. *Staff Report*, at p. 60. A web-based
18 system could be structured to facilitate instantaneous confirmation of program-based eligibility by
19 cross-referencing customer information with data regarding other programs. Moreover, as
20 discussed above, a web-based enrollment vehicle would complement a prequalification procedure.
21 By starting early on developing a web-based system, the Commission and Solix can do the
22 necessary testing to ensure that any database issues are resolved *before* the system is implemented.
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1 IV. CONCLUSION.

2 SureWest appreciates the Commission's efforts to rectify the problems with the
3 certification and verification processes under the LifeLine program, and SureWest values the
4 opportunity to work collaboratively with all interested parties in this effort. In large part, the
5 Proposed Decision is a step forward in addressing the issues with the LifeLine program.
6 SureWest urges the Commission to modify the Proposed Decision as set forth above, and to focus
7 the parties' attention on the long-term issues facing the LifeLine program. Most importantly, the
8 Commission should require the use of first-class mail for all mailings from Solix to customers.
9 The Commission should also adopt a pre-qualification process to prevent substantial back-bills
10 that can drive low-income customers off the system. In connection with these efforts, the
11 Commission should broaden the channels for receiving LifeLine certification documentation and
12 actively pursue a web-based enrollment process. With these long-term solutions in place, the
13 Commission will be able to put forward the most effective certification and verification process
14 possible within the strictures of the *Lifeline / Linkup Order*.
15

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17 As the Commission continues this process, however, it should be noted that some of the
18 customer ire and some portion of the cause for the low response rates is that fact that the FCC has
19 placed an additional burden on customers seeking LifeLine discounts. Naturally, some customers
20 who did not meet the proper income levels were nevertheless continuing to receive LifeLine
21 discounts under the self-certification process in place prior to July 1, 2006. While the
22 Commission should certainly undertake strong efforts to ensure that qualifying individuals receive
23 LifeLine discounts, the Commission should also realize that some of the results of the new system
24 are exactly as the FCC intended. The Commission's goals should not be to approximate the
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1 program participation and response rates under the self-certification regime, but to make the new
2 program as effective and robust as it can be under the circumstances.

3
4 Respectfully submitted,

5 E. Garth Black
6 Mark P. Schreiber
7 Sean P. Beatty
8 Patrick M. Rosvall
9 COOPER, WHITE & COOPER LLP
10 201 California Street, 17th Floor
11 San Francisco, CA 94111
12 Telephone (415) 433-1900
13 Facsimile: (415) 433-5530

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16
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21
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23
24
25
26
27
28
By: 

Sean P. Beatty
email: sbeatty@cwclaw.com

Attorneys for
SureWest Telephone and SureWest TeleVideo

CERTIFICATE OF SERVICE BY MAIL

I, Noel Gielegthem, declare:

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is COOPER, WHITE & COOPER LLP, 201 California Street, 17th Floor, San Francisco, CA 94111.

On April 23, 2007, I served the following:

**OPENING COMMENTS OF SUREWEST TELEPHONE (U 1015 C)
AND SUREWEST TELEVIDEO (U 6324 C)**

ON

**PROPOSED DECISION OF ALJ JONES ADOPTING STRATEGIES TO IMPROVE THE
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by placing a true and correct copy thereof with the firm's mailing room personnel for mailing in accordance with the firm's ordinary practices to the parties on the CPUC's service list for this proceeding. A true and correct copy was also e-mailed to parties who provided an e-mail address.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 23, 2007 at San Francisco, California.



Noel Gielegthem

SERVICE LIST

CPUC Service List as of April 19, 2007 Proceeding No. R. 04-12-001

ANNA KAPETANAKOS
ATTORNEY AT LAW
AT&T CALIFORNIA
525 MARKET STREET, ROOM 2024
SAN FRANCISCO, CA 94105

LINDA COOPER
GLOBAL VALLEY NETWORKS, INC.
515 KEYSTONE BLVD.
PATTERSON, CA 95363-8861

CHRISTINE MAILLOUX, ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

DARCY BEAL, ASSOCIATE DIRECTOR
AT&T CALIFORNIA
525 MARKET STREET, 19TH FLOOR, 21
SAN FRANCISCO, CA 94105-2727

DONNA L. WAGONER
CALIF PUBLIC UTILITIES COMMISSION
UTILITY AUDIT, FINANCE
& COMPLIANCE BRANCH
AREA 3-C
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

EDWARD J SCHNEIDER, JR
FORESTHILL TELEPHONE CO., INC.
4655 QUAIL LAKES DR.
STOCKTON, CA 95207

BRIAN PLACKIS CHENG
BLUE CASA COMMUNICATIONS
911 OLIVE STREET
SANTA BARBARA, CA 93101

ANGELA YOUNG
CALIF PUBLIC UTILITIES COMMISSION
FISCAL & ADMINISTRATIVE SERVICES
AREA 3-E
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CHARLES E. BORN, MANAGER-STATE
GOVERNMENT AFFAIRS
FRONTIER, A CITIZENS
TELECOMMUNICATIONS COMPANY
PO BOX 340
ELK GROVE, CA 95759

LAW DEPARTMENT FILE ROOM
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120-7442

DAVE CLARK
KERMAN TELEPHONE COMPANY
811 S MADERA AVE.
KERMAN, CA 93630

DON EACHUS
VERIZON CALIFORNIA, INC.
CA501LB
112 S. LAKE LINDERO CANYON ROAD
THOUSAND OAKS, CA 91362

ENRIQUE GALLARDO
LATINO ISSUES FORUM
160 PINE STREET, SUITE 700
SAN FRANCISCO, CA 94111

GAIL LONG, TELEPHONE COMPANY
HAPPY VALLEY/HORNITOS/WINTERHAVEN
PO BOX 1566
OREGON, OR 97045

BETTINA CARDONA, PRESIDENT
FONES4ALL CORPORATION
6320 CANOGA AVE, SUITE 650
WOODLAND HILLS, CA 91367

CHERRIE CONNER
CALIF PUBLIC UTILITIES COMMISSION
PROGRAM MANAGEMENT &
IMPLEMENTATION BRANCH
AREA 3-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DAN DOUGLAS
THE PONDEROSA TELEPHONE CO.
PO BOX 21
O'NEALS, CA 93645

DALE DIXON, ATTORNEY AT LAW
VYCERA COMMUNICATIONS, INC.
12750 HIGH BLUFF DRIVE, SUITE 200
SAN DIEGO, CA 92129

DOUGLAS GARRETT, VICE PRESIDENT,
WESTERN REGION REGULATOR
COX CALIFORNIA TELCOM, LLC
DBA COX COMM
2200 POWELL STREET, SUITE 1035
EMERYVILLE, CA 94608-2618

ESTHER NORTHRUP
COX CALIFORNIA TELCOM
5159 FEDERAL BLVD.
SAN DIEGO, CA 92105

GLENDA KOUNTZ
REGULATORY ASSISTANT
KERMAN TELEPHONE CO.
811 S. MADERA AVENUE
KERMAN, CA 93630

GLENN STOVER
ATTORNEY AT LAW
STOVER LAW
221 MAIN STREET, SUITE 800
SAN FRANCISCO, CA 94105-1906

C. HONG WONG
APEX TELECOM, INC.
113 10TH STREET
OAKLAND, CA 94607

JOHN L. CLARK, ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI
DAY & LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

JESSICA T. HECHT
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW
JUDGES
ROOM 5113
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JEFF SCHNUR
SOLIX INC.
PO BOX 902
100 S. JEFFERSON ROAD
WHIPPANY, NJ 7981

JOY C. YAMAGATA
REGULATORY CASE MANAGER
SEMPRA UTILITIES
8330 CENTURY PARK COURT CP 32 D
SAN DIEGO, CA 92123

KAREN A. DEGANNES
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

LINDA LUPTON, REGULATORY MANAGER
SUREWEST TELEPHONE
PO BOX 969
ROSEVILLE, CA 95678

GRETA BANKS
AT&T COMMUNICATIONS OF CALIFORNIA
525 MARKET STREET, 18TH FLOOR, 4
SAN FRANCISCO, CA 94105

JACQUE LOPEZ, LEGAL ASSISTANT
VERIZON CALIFORNIA INC
CA501LB
112 LAKEVIEW CANYON ROAD
THOUSAND OAKS, CA 91362

JEFF COMPTON
VICE RESIDENT CARRIER RELATIONS
TELSCAPE COMMUNICATIONS INC.
606 EAST HUNTINGTON DRIVE
MONROVIA, CA 91016

JOHN A. GUTIERREZ
COMCAST
12647 ALCOSTA BOULEVARD, SUITE 200
SAN RAMON, CA 94544

JAMES LOWERS
THE SISKIYOU TELEPHONE COMPANY
PO BOX 157
ETNA, CA 96027

KAREN BAILEY
VERIZON WEST COAST
VERIZON CALIFORNIA, INC.
HQE01G69
600 HIDDEN RIDGE DR., E01E55
IRVING, TX 75038-2092

KIMBERLY KRETCHMER
CITIZENS TELECOM COS OF CA/GS/TU
180 S. CLINTON AVENUE
ROCHESTER, NY 14646-0400

LATANYA LINZIE
COX CALIFORNIA TELCOM, L.L.C.
2200 POWELL STREET, SUITE 1035
EMERYVILLE, CA 94608

HAZLYN FORTUNE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOE CHICOINE, MANAGER, STATE
GOVERNMENT AFFAIRS
FRONTIER COMMUNICATIONS
PO BOX 340
ELK GROVE, CA 95759

JESUS G. ROMAN, ATTORNEY AT LAW
VERIZON CALIFORNIA, INC.
112 S. LAKEVIEW CANYON ROAD, CA501LB
THOUSAND OAKS, CA 91362

JOLEEN HOGAN
CAL-ORE TELEPHONE COMPANY
PO BOX 847
DORRIS, CA 96023

JULIE WEIGAND
RICHARD HEATH AND ASSOCIATES, INC.
590 W. LOCUST AVENUE, SUITE 103
FRESNO, CA 93650

KAREN JONES
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE
LAW JUDGES
ROOM 2106
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KRISTIE FLIPPO
TIME WARNER CONNECT
2805 DALLAS PKWY STE 140
PLANO, TX 75093-8720

W. LEE BIDDLE, ATTORNEY AT LAW
FERRIS & BRITTON, P.C.
401 WEST A STREET, SUITE 1600
SAN DIEGO, CA 92101

LINDA BURTON
PO BOX 219
OAKHURST, CA 93644

LYNNE MARTIN
PAC-WEST TELECOMM, INC.
1776 MARCH LANE, SUITE 250
STOCKTON, CA 95207

LORRAINE A. KOCEN
VERIZON CALIFORNIA INC.
112 S. LAKEVIEW CANYON ROAD
THOUSAND OAKS, CA 91362

LORRIE BERNSTEIN
MOSS ADAMS LLP
3121 WEST MARCH LANE, STE. 100
STOCKTON, CA 95219-2303

LOUIE DE CARLO, COMPLIANCE MANAGER
MCI METRO ACCESS TRANSMISSION
SERVICES
201 SPEAR STREET, 9TH FLOOR
SAN FRANCISCO, CA 94105

MARGARET L. TOBIAS
ATTORNEY AT LAW
TOBIAS LAW OFFICE
460 PENNSYLVANIA AVENUE
SAN FRANCISCO, CA 94107

MARGARITA GUTIERREZ
DEPUTY CITY ATTORNEY
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE, RM.
375
SAN FRANCISCO, CA 94102

MICHAEL SHAMES, ATTORNEY AT LAW
UTILITY CONSUMERS' ACTION NETWORK
3100 FIFTH AVENUE, SUITE B
SAN DIEGO, CA 92103

NELSONYA CAUSBY
ATTORNEY AT LAW
AT&T CALIFORNIA
525 MARKET ST., STE 2025
SAN FRANCISCO, CA 94105

NATALIE BILLINGSLEY
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS
& CONSUMER ISSUES BRANCH
ROOM 4108
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

OLIVIA B. WEIN, ATTORNEY AT LAW
NATIONAL CONSUMER LAW CENTER
1001 CONNECTICUT AVE., NW., STE. 510
WASHINGTON, DC 20036

PETER M. HAYES, DIRECTOR
AT&T CALIFORNIA
525 MARKET STREET, ROOM 1919
SAN FRANCISCO, CA 94105-2727

PETER GLASS
SEREN INNOVATIONS, INC.
15 SOUTH 5TH STREET, STE 500
MINNEAPOLIS, MN 55402

MELISSA W. KASNITZ
DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, THIRD FLOOR
BERKELEY, CA 94704-1204

ROSS A. BUNTROCK
WOMBLE CARLYLE SANDRIDGE
& RICE PLLC
1401 EYE STREET, N.W. SEVENTH FLOOR
WASHINGTON, DC 20005

REGINA COSTA
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

RISA HERNANDEZ
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES
& PRICING BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROBERT GNAIZDA
POLICY DIRECTOR/GENERAL COUNSEL
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE
SECOND FLOOR
BERKELEY, CA 94704

ROBERT HAGA
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5304
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SINDY J. YUN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4300
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SEAN WILSON
CALIF PUBLIC UTILITIES COMMISSION
UTILITY AUDIT, FINANCE
& COMPLIANCE BRANCH
AREA 3-C
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SHARON THOMAS
TECHNOLOGIES MANAGEMENT, INC.
210 N. PARK AVE.
WINTER PARK, FL 32789

SUZANNE TOLLER, ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

THALIA N.C. GONZALEZ
LEGAL COUNSEL
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVE., 2ND FLOOR
BERKELEY, CA 94704

JOSIE WEBB
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SEAN WILSON
TALK.COM
12020 SUNRISE VALLEY, STE.250
RESTON, VA 20191

ERIN DAWLEY
HORNITOS TELEPHONE COMPANY
PO BOX 5158
MADISON, WI 53705-0158

KARL ANDREW
REGULATORY AFFAIRS
SAGE TELECOM, INC.
805 CENTRAL EXPRESSWAY SO, STE 100
ALLEN, TX 75013-2789

MICHAEL MORCOM
VERIZON SELECT SERVICES, INC.
600 HIDDEN RIDGE, HQE01J016
IRVING, TX 75038

MARY PHARO
VAR TEC TELECOM, INC.
1600 VICEROY DRIVE
DALLAS, TX 75235

DAVID MORIARTY
MEDIA ONE/AT&T BROADBAND
550 CONTINENTAL BLVD.
EL SEGUNDO, CA 90245

THALIA R. GIETZEN
VYCERA COMMUNICATION, INC.
12750 HIGH BLUFF DR., STE.200
SAN DIEGO, CA 92130-2565

ERIC WOLFE, REGULATORY
DUCOR TELEPHONE COMPANY
PO BOX 42230
BAKERSFIELD, CA 93384-2230

JOSEPHINE WONG
APEX TELECOM INC.
PO BOX 1917
OAKLAND, CA 94604

LORRIE BERNSTEIN
PINNACLES TELEPHONE COMPANY
340 LIVE OAK ROAD
PAICINES, CA 95043-9998

YVONNE SMYTHE
CALAVERAS TELEPHONE COMPANY
PO BOX 37
COPPEROPOLIS, CA 95228

ROSE CULLEN
THE VOLCANO TELEPHONE COMPANY
PO BOX 1070
PINE GROVE, CA 95665-1070

ADRIENNE M. MERCER
REGULATORY COMPLIANCE ANALYST
SAGE TELECOM, INC.
805 CENTRAL EXPRESSWAY S, STE 100
ALLEN, TX 75013